



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7  
25 FUNSTON ROAD  
KANSAS CITY, KANSAS 66115

JUL 6 1988

MEMORANDUM

SUBJECT: Transmittal of Inspection Report - RCRA

FROM: Robert B. Dona *RBDona*  
Chief, RCRA Monitoring Section, EMCM/ENSV

TO: Michael J. Sanderson  
Chief, RCRA/WSTM

This memorandum transmits the following compliance evaluation inspection report performed by the RCRA Monitoring Section, Environmental Monitoring and Compliance Branch, Environmental Services Division.

<u>Facility</u>	<u>EPA ID Number</u>	<u>Activity Number</u>	<u>Areas of Non-Compliance</u>
Norplex/Oak Postville, Ia	IAD073489288	ATF20	1. No documentation of personnel training. 2. No exception report for unsigned manifest. 3. No LDR notices. 4. Unmanifested waste shipment. 5. No labeling and dating of containers. 6. No aisle spacing. 7. Containers in poor condition. 8. Waste determination.
Attachments			

7001  
R00330181  
RCRA RECORDS CENTER

RECEIVED  
JUL 7 1988  
IOWA SECTION

RCRA INSPECTION REPORT RECEIPT AND FOLLOW-UP REQUEST

Facility Name: Norplex/Oak

Facility Location: Postville, Iowa

EPA ID Number: IAD073489288

Date of Inspection: 6/7/88

Inspector: Tim Curry

Activity Number: ATF20 Inspection Type: A55

Date Report Transmitted: 7/5/88

\*Date Report Received: / /

\*Additional Information Requested/Needed Not Included In Report:

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#Photographs Taken: 3

#Photographs in Report: 3

\*Additional Copies Needed (Specify Which)

\*Additional Information Needed By: / /

Field Notes Taped [Yes/No]

\*Disposition: Retain, Discard, Transcribe.

#Samples Taken: 0

#Samples Analyzed: 0

\*Disposition: Retain, Discard, Analyze more (specify which)

\*Report Reviewed By:

\*Date Review Completed: / /

\*Items to be completed by RCRA Branch, WSTM and returned to Chief, Field Investigations Section, EMCM/ENSV

RCRA COMPLIANCE EVALUATION REPORT

AT

NORPLEX/OAK  
NORTHEAST COUNTY ROAD  
P.O. BOX 370  
POSTVILLE, IOWA 52162

EPA ID NUMBER: IAD073489288

ON

June 7, 1988

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY  
Region VII  
Environmental Services Division

INTRODUCTION

At the request of the Waste Management Division (WSTM), a RCRA compliance evaluation inspection was performed at Norplex/Oak in Postville, Iowa on June 7, 1988. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. This report presents the results of the inspection.

PARTICIPANTS

Norplex/Oak:

Mark Zweibohmer, Maintenance Superintendent  
Thomas R. Sattler, Jr., Manufacturing Engineer

U.S. Environmental Protection Agency (EPA):

Tim Curry, Environmental Engineer

INSPECTION PROCEDURES

The inspection began on the morning of June 7, 1988. Mr. Mark Zweibohmer, the Maintenance Superintendent, was the facility contact. Mr. Thomas R. Sattler Jr., Manufacturing Engineer, was also present during the inspection. Following the presentation of credentials, we discussed the facility's confidentiality rights. The inspection continued with a discussion of the facility operations, a tour of the plant, a review of records and documents and finished with an exit briefing. At the exit briefing we discussed the violations noted during the inspection and forms were presented to Mr. Zweibohmer. He signed the Notice of Violation, the Inspection Confidentiality Claim

forms, and the Receipt for Documents. No confidential business information was claimed at that time.

#### FACILITY DESCRIPTION

Norplex/Oak produces high pressure industrial laminates. The laminates are formed using a paper, cloth, or fiberglass sheet and coating them with resins. The sheets are then cured by heat and the resins harden to form a shell around the sheet. The sheets are later stacked together and using heat and pressure are formed into boards of varying thickness. The boards can be cut and formed into specified lengths and shapes. The products typically are used for electrical applications such as insulation or circuit boards.

Norplex Division - UOP, Inc. bought another existing company in 1987 and changed the name of both companies to Norplex/Oak. None of the operations at the Postville, Iowa plant changed with the merger. Norplex/Oak is a division of Allied Signal.

The facility originally notified and submitted a Part A permit application for storage. The U.S. EPA acknowledged their interim status. In 1982 they requested removal from the interim status and reclassification as a generator. On May 15, 1984 their interim status was terminated by the U.S. EPA. They currently generate approximately 3400 gallons of waste each month. The waste is shipped to Waste Research and Reclamation in Eau Claire, Wisconsin. Shipments are sent on an average of every twenty-six days. Storage time ranged from two days to eighty-two days (see Table 1).

The wastes generated by the operation of the plant include: general refuse, non-contact cooling water, scrap resin, cleaning solvent, scrap metal, and used oil. A discussion of the generation and disposal of each waste stream follows:

1. General refuse includes office wastes, packaging wastes, scrap paper, scrap cloth and fiberglass, and some trimmings from laminated boards. All the above are disposed of as solid waste. It is hauled to the Chickasaw County Landfill.

2. Norplex/Oak operates a boiler. The non-contact cooling water is collected in a pond located on the west side of the building. There is an NPDES permit for discharge of the cooling water. No other wastewater discharges to the cooling pond.

3. There are different types of resins used to make the laminates. Some are cut with water, some with solvents. Occasionally there is some resin product that can not be used due to some contaminate or physical alteration. Typically, the unusable material is returned to the supplier. In one case, the material came from a sister plant that was closing. It was contaminated with dibutyl thalate and dirt (see Attachment 2). Norplex disposed of the material through a broker. The broker shipped the resin (D001) to a cement kiln to be used as

fuel. In addition to non-usable product, Norplex generates some unused material from the resin application machines. The waste is generated when a run is completed and there is some resin remaining. There are three types of resin material; a phenolic resin, an epoxy resin and a melamine resin. The phenolic resin is cut with methanol and toluene before application. The epoxy resin is cut with acetone, dimethyl formamide, and propylene glycol ether. The melamine resin is dry applied and no solvents used. The unused portions from production runs are placed into drums. The material would be ignitable (D001) however, it is commonly placed into the same drums as F-listed wastes. All drums go to Waste Research and Reclamation (WRR) in Eau Claire, Wisconsin.

4. The application machines are cleaned with solvent mixtures. The mixtures are either isopropyl alcohol and toluene or an isopropyl alcohol, toluene, acetone, and propylene glycol ether mix. The waste generated from cleaning is an F005 listed waste stream. It is also stored in 55-gallon drums and shipped off-site to WRR.

5. One of the main products of Norplex/Oak is laminated boards to be used as circuit boards. The circuit boards have a copper plate on one side. Some scrap copper is generated from trimmings. The scrap is collected and shipped to their sister plant in LaCrosse, Wisconsin. The copper is reclaimed at the Wisconsin plant.

6. Norplex generates some used hydraulic oil and used lubricating oil. The hydraulic oil is currently being set to S and S Industrial Services in Waukesha, Wisconsin for recycling. The lubricating oil has been sold to Rock Oil Company also in Wisconsin. They generate about 500 gallons of used hydraulic oil and about 35 gallons of lubricating oil each month.

Norplex/Oak employs about 150 people and operates three shifts five days a week with overtime occasionally on the weekends. When the plant is not operating a security guard is on-site. The buildings and structures are surrounded by a chain-link fence with barbed wire strands atop.

#### FINDINGS AND OBSERVATIONS

A review of the required plans and records was conducted. Three violations were noted and a description of each follows:

1. The personnel training plan identified the job positions that require training. It described the positions. The plan also described the type and amount of training. No records have been kept on the people filling each job position. In addition, no training documentation was available. There are about twenty employees that require training according to the plan. Norplex/Oak was cited as in violation of 40 CFR 265.16(d).

2. The copies of the manifests for off-site shipment were reviewed. A Table of the shipments since 1986 follows:

TABLE 1

<u>Date of Shipment</u>	<u>Number of Containers</u>
November 7, 1986	80
January 28, 1987	80
April 3, 1987	82
April 28, 1987	84
July 8, 1987	82
August 27, 1987	78
September 23, 1987	84
October 7, 1987	83
November 5, 1987	88
January 14, 1988	86
February 18, 1988	88
* April 6, 1988	79
April 22, 1988	83
May 20, 1988	83
May 25, 1988	73

\*This shipments manifest was not returned signed by Waste Research and Reclamation.

The above shipments were of 55-gallon drums holding F005 listed waste (mixing of F-listed waste with characteristic waste occurs). The manifest for the shipment of April 6, 1988 did not have the return copy signed by the receiving facility. Norplex/Oak had not submitted a 40 CFR 262.42(a) exception report for the overdue copy of the manifest. This was cited on the Notice of Violation (NOV).

3. The shipments of waste since November 1986 should have been accompanied by a Land Disposal Restriction Notice as required by 40 CFR 268.7(a). None of the manifests were accompanied by the notice. This was cited as a violation on the NOV.

4. One shipment of unusable epoxy resin was sent in May 1988 to Aquatech (see Attachment 2). Mr. Sattler said that a sample was submitted to Aquatech and the results indicate it would be an ignitable waste. The facility personnel indicated that the corporate office had determined that it was not a waste as it had not been used.

It did appear to be an unusable material for Norplex/Oak purposes. They did not sell the material to a facility that could use it for its original purpose (coating). Aquatech accepted the shipment as a hazardous material. Mr. Sattler and Mr. Zweibohmer believed that Aquatech shipped the waste on to a cement kiln to be used as a fuel source. These actions appear to be the discarding of a material. Discarded materials are solid waste. Solid wastes are hazardous whenever they exhibit the characteristic of ignitability. Therefore,

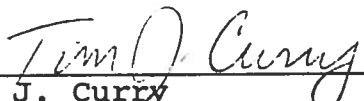
it should have been shipped using a hazardous waste manifest. This was not cited as a violation at the time of the inspection. It was pointed out to Mssr. Sattler and Zweibohmer that it should have been shipped as a hazardous waste.

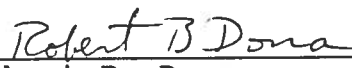
In addition to the recordkeeping requirements, some waste storage violations were noted. Each violation is discussed below:

1. There were forty-four barrels of waste in storage at the time of this inspection (see photos). None of the barrels were labeled "Hazardous Waste" or had a date of accumulation posted on them. In addition two satellite accumulation barrels did not have any identifying marks. These are generator requirements of 40 CFR 262.34.
2. Norplex/Oak was not maintaining aisle spacing in accordance with 40 CFR 265.35 (see photos).
3. Drums in the storage area were damaged due to the expansion of the containers material in the heat (see photos). It was not determined if they had begun leaking yet. According to 40 CFR 265.171 Norplex/Oak must transfer hazardous waste into containers that are in good condition.
4. Two containers in the storage area were open (see photo 2). These containers appeared to hold some hardened resin material and other general refuse. When I asked Mr. Zweibohmer what the material was he did not know. Apparently no waste determination in accordance with 40 CFR 262.11 had been conducted. This was cited as a violation.

#### CONCLUSIONS

Norplex/Oak has been shipping all chemical waste streams to Waste Research and Reclamation. They have been shipping off-site on an average of once every twenty-six days. Most recordkeeping is in place, however, some personnel training needs to be conducted. Waste handling, marking, and dating requirements were not being met (maybe due to the lack of training). Though the waste determination is inadequate it looked as though all questionable material was being shipped to a hazardous waste storage/treatment/disposal facility.

  
\_\_\_\_\_  
Tim J. Curry  
Environmental Engineer  
Date: 7/1/88  
Activity Number: ATF20

  
\_\_\_\_\_  
Robert B. Dona  
Chief, RCRA Monitoring Section  
Date: 7-1-88

## Attachments

1. Notice of Violation, Inspection Confidentiality Claim forms, and Receipt for Documents (5 pages)
2. Epoxy resin information (3 pages)
3. Photographs (1 page)
4. Checklists (16 pages)



**Notice of Violation Pursuant to Requirements  
of the Resource Conservation and Recovery Act (RCRA)**

T0: Facility Name: Norfolk - 6K  
Address: 100 F-2 ST  
32 FORTYFOUR RD S. 2ND FL  
EPA ID Number: 45-1147-25 Date: 10/1/82

During an inspection just completed to determine compliance with the requirements of Subtitle C of RCRA and regulations promulgated pursuant thereto, the following violations were identified:

[illegible]

This notice is provided to call your attention to those areas of noncompliance at the earliest possible time. This notice does not constitute a compliance order (Administrative Civil Complaint) issued pursuant to Section 3008 of RCRA and may not be a complete listing of all violations which may be identified as a result of this inspection.

The Verde Lake is hereby requested to submit in writing within 10 days of receipt of this notice a description of all corrective actions taken and/or a schedule for completion of necessary correction actions to be taken to: Michael Smith, Chief, RCRA Branch, U. S. Environmental Protection Agency, Region VII, 726 Minnesota Ave., Kansas City, Kansas, 66101. The corrective actions taken by Verde Lake will be considered in subsequent enforcement follow-up. Should civil penalties be assessed, corrective action(s) will be considered in assessing the penalty amount.

If you have any questions on this Notice or wish to discuss your response, you may call \_\_\_\_\_ (U. S. EPA) at \_\_\_\_\_, or \_\_\_\_\_, \_\_\_\_\_, at \_\_\_\_\_.

This Notice prepared by                  Date: 6/7/82

The undersigned person hereby acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: Mark A Zweibauer Date: 10-07-18  
Signature: [Signature]  
Title: Plant. Sect.

Notice of Violation Pursuant to Requirements  
of the Resource Conservation and Recovery Act (RCRA)

TO: Facility Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
EPA ID Number: \_\_\_\_\_ Date: \_\_\_\_\_

During an inspection just completed to determine compliance with the requirements of Subtitle C of RCRA and regulations promulgated pursuant thereto, the following violations were identified:

<u>Citation</u>	<u>Description of Violation</u>
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
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_____	_____
_____	_____
_____	_____

This notice is provided to call your attention to those areas of noncompliance at the earliest possible time. This notice does not constitute a compliance order (Administrative Civil Complaint) issued pursuant to Section 3008 of RCRA and may not be a complete listing of all violations which may be identified as a result of this inspection.

The \_\_\_\_\_ is hereby requested to submit in writing within 10 days of receipt of this notice a description of all corrective actions taken and/or a schedule for completion of necessary correction actions to be taken to: \_\_\_\_\_, Chief, RCRA Branch, U. S. Environmental Protection Agency, Region VII, 726 Minnesota Ave., Kansas City, Kansas, 66101. The corrective actions taken by \_\_\_\_\_ will be considered in subsequent enforcement follow-up. Should civil penalties be assessed, corrective action(s) will be considered in assessing the penalty amount.

If you have any questions on this Notice or wish to discuss your response, you may call \_\_\_\_\_ (U. S. EPA) at \_\_\_\_\_, or \_\_\_\_\_, at \_\_\_\_\_.

This Notice prepared by \_\_\_\_\_ Date: \_\_\_\_\_

The undersigned person hereby acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: \_\_\_\_\_ Date: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Title: \_\_\_\_\_

ENVIRONMENTAL PROTECTION AGENCY  
RCRA INSPECTION  
CONFIDENTIALITY NOTICE

Name and Address of Inspector(s)  <p align="center"><i>Tim Curry</i></p> U.S. EPA, Region VII ENSV Division 25 Funston Road Kansas City, Kansas 66115	Name and Address of Facility <p align="center"><i>Norplex - Oak P.O. Box 370 Postville, Iowa 52162</i></p>	
Name of Individual to Whom Notice Given <p align="center"><i>Mark Zweibohmer</i></p>	Owner, Operator, or Agent in Charge	
	Title	
	Address	
	Title <p align="center"><i>Maintenance Supt.</i></p>	Date <p align="center"><i>6/7/88</i></p>

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 U.S.C. 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Resource Conservation and Recovery Act, Section 3007, as amended. EPA is required to make inspection data available in response to FOIA requests, unless the Administrator of the Agency determines that the data contains information entitled to confidential treatment.

Any or all of the information collected by EPA during the inspection may be claimed confidential, if it relates to trade secrets or commercial of financial matters that you consider to be confidential. If you make claims of confidentiality, EPA will disclose the information only to the extent, and by the means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential information. Among other things, the regulations require that the EPA notify you in advance of publicly disclosing any information you have claimed and certified confidential.

To claim information confidential, you must certify that each claimed item meets all of the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. The information is not, and has not been, reasonably obtained without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time you may make claims that some or all of the information is confidential and meets the four criteria listed above.

## RCRA INSPECTION CONFIDENTIALITY NOTICE

Facility

Norplex - Oak

If you are not authorized by your company to make confidentiality claims, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials, to the Owner, Operator, or Agent in Charge of your firm, within two days of this date. That person must return a statement, specifying any information which should receive confidential treatment.

This statement from the Owner, Operator, or Agent in Charge should be addressed to:

Mr. David A. Wagoner  
Director, Waste Management Division  
United States Environmental Protection Agency  
726 Minnesota Avenue  
Kansas City, Kansas 66101

and mailed by registered, return-receipt requested mail with in seven (7) calendar days of receipt of this Notice.

Failure by your firm to submit a written request that information be treated as confidential, either at the completion of the inspection or by the Owner, Operator, or Agent in charge, within the seven-day period, will be treated by the EPA as a waiver by your company of any claims for confidentiality regarding the inspection data.

*To be completed by the facility official receiving this Notice:*

I have received and read this Notice.

Name Mark A Zweibohmer

Title Maintenance Superintendent

Signature Mark A Zweibohmer / For Norplex / Oak

Date 6-7-88

If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the Owner, Operator, or Agent in charge of the company. If there is another company official who should also receive this information, please designate below:

Name \_\_\_\_\_

Title \_\_\_\_\_

Address \_\_\_\_\_

U.S. ENVIRONMENTAL PROTECTION AGENCY  
726 MINNESOTA AVENUE  
KANSAS CITY, KANSAS 66101

REQUEST FOR CONFIDENTIAL TREATMENT

Name of Individual Mark Z weibchauer	Title Maint. Supt.	Date 6/7/88
Firm Name Norplex-Oak	Firm Address Northeast Co Rd. PO Box 370 Pottsville Iowa 52162	

Information for which Confidential Treatment is requested:

Acknowledgement of Claimant

The undersigned requests that confidential treatment of the information described be provided in accordance with provisions of the Freedom of Information Act (FOIA), 5 U.S.C. 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Resource Conservation and Recovery Act (RCRA), Section 3007, as amended. The undersigned further acknowledges that he/she is authorized to make such claims for his/her firm.

The undersigned also certifies that each item described above meets all of the following criteria:

(1) The company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures; (2) The information is not, and has not been, reasonably attainable without the company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding; (3) The information is not publicly available elsewhere; and (4) Disclosure of the information would cause substantial harm to the company's competitive position.

Signature (Owner, Operator, or Agent) Mark Z weibchauer For Norplex-Oak		Title Maint. Supt.
Name of Inspector Tim Curry	Title Env. Engr.	Inspector's Signature Tim J. Curry

## U.S. ENVIRONMENTAL PROTECTION AGENCY

## RECEIPT FOR SAMPLES AND DOCUMENTS

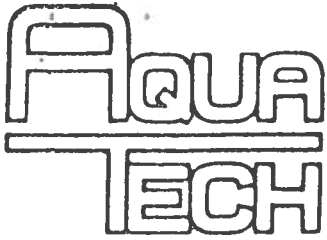
Inspector(s) Name and Address:  Tim Curry  U.S. EPA, Region VII ENSV Division 25 Funston Road Kansas City, Kansas 66115		Firm Name and Address Norplex - Oak Northeast Co. Rd Postville, Iowa 52162	
		Name of Individual Mark Zweibohmer	
		Title Maint Supt.	
Date Collected 6/7/88	Samples were: <input type="checkbox"/> PURCHASED <input checked="" type="checkbox"/> RECEIVED NO CHARGE <input type="checkbox"/> BORROWED		
Sample Numbers		Amount Paid for Samples	
Duplicate Samples Requested  <input type="checkbox"/> YES <input type="checkbox"/> NO		Method of Payment  <input type="checkbox"/> CASH <input type="checkbox"/> VOUCHER <input type="checkbox"/> TO BE BILLED	

The documents and samples of chemical substances and/or mixtures described below were collected in connection with the administration and enforcement of the Resource Conservation and Recovery Act.

Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

1 - Aquafach Info. (3 pages)

Signature (Owner, Operator, or Agent) Mark A. Zweibohmer / For Norplex/Oak		Title Maint. Supt.
Name of Inspector Tim Curry	Title Env. Engr.	Inspector's Signature Tim Curry



AQUA-TECH, INCORPORATED

140 South Park Street, Port Washington, Wisconsin 53074  
Phone (414) 284-5746 or (414) 375-0407 (Metro Milw.)

March 4, 1988

Mr. Mark Zweibohmer  
Maintenance Superintendent  
Norplex/Oak  
Northeast County Road  
P. O. Box 370  
Postville, IA 52162

Dear Mr. Zweibohmer:

Enclosed please find Waste Stream Profile Sheets for the following:

WS#30-289

Resin Epoxy

Please review the report for this waste stream, sign the bottom of the form where highlighted and return it to my attention. One copy of this report may be retained for your files.

Thank you for your cooperation. If you should have any questions, please do not hesitate to contact me.

Sincerely,

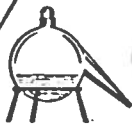
AQUA-TECH, INC.

A handwritten signature in cursive script that reads "Donna Albert".

Donna Albert  
Order Processing Supervisor

DA/jp

Enclosures



Groce Labs

## WASTE STREAM PROFILE SHEET

Phone (414) 284-5746  
 Wisconsin 800-451-5116  
 Outside WI 800-338-8504  
 FAX (414) 284-0243

140 South Park St.  
 Port Washington  
 Wisconsin 53074

WS# 30-289  
 TH# 8300  
 DATE: 3/04/88  
 SALES REP: G. Williams

## I. GENERATOR INFORMATION

Name of Company Norplex/Oak  
 Facility Address Northeast County Road  
P. O. Box 370  
Postville, IA 52162  
 Technical/General Contact Mark Zweibohmer  
 Title Maintenance Supt.

US EPA ID# IAD073489288  
 Name of Company \_\_\_\_\_  
 Billing Address \_\_\_\_\_  
 Phone ( 319 ) 864-7321  
 Emergency Contact \_\_\_\_\_  
 24-Hour Emergency Phone Number (     ) \_\_\_\_\_

## II. WASTE STREAM GENERAL INFORMATION

Waste Name Resin Epoxy  
 Process Producing Waste Virgin Product Contaminated  
with Dibutyl Phthalate

Anticipated Volume \_\_\_\_\_ Frequency Quarterly  
 Current Inventory 80 dr.  
 Container Type ☒ Drums: \_\_\_\_\_ Weight \_\_\_\_\_ Size 55 gal  
☐ Cube ☐ Bulk Solids ☐ Bulk Liquids ☐

## III. CHEMICAL COMPOSITION (Total must add up to 100%)

Constituents		
Epoxy Resins w/Bromine	80	%
Acetone	20	%
Dibutyl Phthalate	<1	%
Dirt	<1	%
		%
		%
		%
		%
		%
		%
		%

## IV. PHYSICAL DESCRIPTION (Cumulative Score)

Physical State ☒ Liquid ☐ Solid ☐ Semi-Solid  
☐ Sludge ☐ Gas ☐ \_\_\_\_\_  
 Viscosity ☐ Low ☒ Medium ☐ High  
 Liquid Layering ☒ None ☐ Bilayered ☐ Multilayered  
 Color Tan  
 % Solids 0 % Liquids 100  
 pH 6 Specific Gravity 1.2 g/ml  
 Flash Point\* F. <75 % Water <0.5  
 BTU/lb 13,000 % Halogens 0.23  
 Ignitability ☐ Yes ☐ No  
 Oxidizer ☐ Yes ☒ No Acid Reactivity ☒ Yes ☐ No  
 Pumpable ☒ Yes ☐ No Water Reactivity ☐ Yes ☒ No

## V. METALS (mg/l or ppm)

Total	EP Tox		Total	EP Tox
Arsenic (As)	None	Copper (Cu)		None
Barium (Ba)		Nickel (Ni)		
Cadmium (Cd)		Zinc (Zn)		
Chromium (Cr)		Thallium (Tl)		
Lead (Pb)		Chromium Hex		
Mercury (Hg)		Other		
Selenium (Se)				
Silver (Ag)				

## VI. NON-METALS (ppm or %)

Free Sulfide <75ppm  
 Free Cyanide <50ppm  
 Total Sulfide \_\_\_\_\_  
 Total Cyanide \_\_\_\_\_  
 PCB \_\_\_\_\_

## VII. SHIPPING INFORMATION (From 49 CFR)

Proper DOT Shipping Name "RO" Waste Flammable Liquid, NOS (D001)  
 DOT Hazard Class Flammable Liquid UN/NA Number UN1993 Reportable Quantity \_\_\_\_\_

## VIII. HAZARDOUS CHARACTERISTICS (From 49 CFR)

US EPA Hazardous Code(s) D001  
 Is the Waste ☐ Pyrophoric ☐ Dioxin Bearing ☐ Water Reactive ☐ Radioactive  
☐ Explosive ☐ Pesticides/Hericides ☐ Biological ☐ Shock Sensitive

## IX. Material Safety Data Sheet (MSDS) Available

☐ See attached

Waste profile completed by (check one) A. ( ) generator; B. ( ) Aqua-Tech; or C. ( ) independent contractor working on behalf of the generator.

I hereby certify that I have personally examined and am familiar with the information submitted in this and all accompanying documents. Based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete, and that all known or suspected hazards have been disclosed. If the boxes, above, for generator or independent contractor are checked, I further certify that the waste characterization upon which Aqua-Tech relies is accurate and complete. I realize that my employer and I may be held liable under federal law, and the laws of many states, for the information provided in this form and any accompanying materials.



**CONTAINS HAZARDOUS MATERIALS**

RCRA COMPLIANCE INSPECTION REPORT  
GENERATOR'S CHECKLIST

Section A - Hazardous Waste Determination

1. Does facility generate any wastes excluded from regulation (40 CFR 261.4)?

\_\_\_ Yes ☒ No

If yes, list wastes and quantities and explain ultimate disposition: \_\_\_\_\_

2. Does facility generate any wastes listed in Subpart D of 40 CFR Part 261?

☒ Yes \_\_\_ No

If yes, list wastes and quantities: FOOS

3. Does facility generate any wastes that exhibit a hazardous characteristic (Subpart C, 40 CFR Part 261)?

☒ Yes \_\_\_ No

a. If yes, list wastes and quantities: DOOI

b. Was determination of characteristic made by:

1) Testing of wastes in accordance with methods in Subpart C, 40 CFR, Part 261?

☒ Yes \_\_\_ No

2) Applying knowledge of waste regarding material or processes used?

☒ Yes \_\_\_ No

4. Does facility generate any other solid wastes?

☒ Yes \_\_\_ No

a. If yes, were wastes determined non-hazardous by testing?

\_\_\_ Yes ☒ No

b. If wastes were determined as non-hazardous by applying knowledge of wastes or processes, list wastes and quantities generated (include processes used):

Solid wastes such as general refuse & used oil

Section B - EPA Identification Number

§262.12

Does generator have an EPA ID Number?

☒ Yes \_\_\_ No

1. If yes, EPA ID No: IAD073489288

2. If no, does facility meet small quantity generator requirements of 40 CFR, 261.5?

\_\_\_ Yes \_\_\_ No

Section C - Manifest

1. Does generator ship wastes off-site?

☒ Yes ☐ No

a. If no, do not fill out Sections C and D.

b. If yes, identify primary off-site facility(s).  
(Use narrative explanations sheet.)

- §262.20

2. Does generator use manifests?

☒ Yes ☐ No

a. If no, is generator a small quantity generator?

☐ Yes ☐ No

§262.21

b. If yes, does manifest include the following information?

1) Manifest Document No.

2) Generators Name, Mailing Address, Telephone #

☒ Yes ☐ No

3) Generator EPA I.D. No.

☒ Yes ☐ No

4) Transporter(s) Name and EPA I.D. No.

☒ Yes ☐ No5)(a) Facility Name, Address and EPA I.D. No.  
Alternate Facility Name, Address and EPA  
I.D. No., if any, or (optional)  
Instructions to transporter to return  
wastes if undeliverable? (optional)☒ Yes ☐ No☒ Yes ☐ No☒ Yes ☐ No6) Description of waste(s) required by DOT -  
proper shipping name, etc.☒ Yes ☐ No7) Total quantity of each waste by units (weight  
or volume), number and type of containers.☒ Yes ☐ No8) Emergency Information (optional) (special  
handling instructions, phone no.)☒ Yes ☐ No

9) The following certification:

"This is to certify that the above named materials  
are properly classified, described, packaged, marked  
and labeled and are in proper condition for trans-  
portation according to the applicable regulations of  
the Department of Transportation and the EPA."

§262.23

3. Does generator accomplish the following?

a. Sign and date each manifest?

☒ Yes ☐ Nob. Obtain signed and dated copy of each manifest  
from transporter?☒ Yes ☒ No

One signed and return  
copy missing, No report submitted  
from designated facility (see 3d.)  
V-1-18

c. Retain one copy of manifest signed by generator and transporter?

☒ Yes ☐ No

d. Retain one signed copy of manifest from designated facility?

☐ Yes ☒ No

Section D - Recordkeeping and Records

- §262.40

1. Does generator keep the following reports for 3 years?

a. Signed copies of manifests from designated facilities

☒ Yes ☐ No

b. Annual/Biennial Reports

☒ Yes ☐ No

c. Exception Reports

☐ Yes ☒ No

d. Test Results, waste analysis, etc.

☒ Yes ☐ No

2. Where are records kept (at facility or elsewhere)?

at facility

3. Who is in charge of keeping the records?

Name Mark Zweibohmer

Title Maind. Supt.

§262.50

Section E - Special Conditions

Has generator exported hazardous wastes to/from a foreign country?

☐ Yes ☒ No

a. If yes, has he filed a notice with the Regional Administrator?

b. Is this waste manifested and signed by Foreign consignee?

☐ Yes ☒ No

c. If generator transported wastes out of the country has he received confirmation of delivered shipment?

N/A ☒ Yes ☐ No

Section F - Pre-Transport Requirements

§262.30

1. Does Generator package waste in accordance with 49 CFR Parts 173, 178, and 179? (DOT requirements)

☐ Yes ☐ No

§262.31

2. Does the Generator use DOT labeling requirements in accordance with 49 CFR Part 172?

☐ Yes ☐ No

§262.32

3. Does the generator mark each package in accordance with 49 CFR Part 172?

☐ Yes ☐ No

4. Is each container of 110 gallons or less marked with the following label?

\_\_\_ Yes ☒ No

HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

Generator's Name and Address \_\_\_\_\_  
Manifest Document Number \_\_\_\_\_

§262.33

5. Does generator have placards to offer to transporters?

\_\_\_ Yes \_\_\_ No

### Section G - Accumulation Time

Does generator accumulate wastes on-site for more than 90 days?

\_\_\_ Yes ☒ No

a. If yes, has generator been granted an extension by proper authority?

\_\_\_ Yes \_\_\_ No

1) If yes, is extension for more than 30 days?

\_\_\_ Yes \_\_\_ No

2) If no, generator is an operator of a storage facility and is subject to the requirements of 40 CFR Part 265. (Complete Facility's Checklist)

b. If no, does generator accomplish the following:

1) Places wastes in containers or tanks?

☒ Yes \_\_\_ No

Note: If containers are used, fill out checklist for containers.  
If tanks are used, fill out checklist for tanks (Items 5b & c are not applicable).

2) Clearly marks each container with the date upon which each period of accumulation begins?

\_\_\_ Yes ☒ No

3) Clearly marks or labels each container and tank with the words "Hazardous Waste"?

\_\_\_ Yes ☒ No

Note: If generator accumulates wastes on-site for 90 days or less, complete Sections H, I, and J

### Section H - Personnel Training

§265.16

8. Does facility have a training program?

☒ Yes \_\_\_ No

a. Are the following records maintained?

- 1) Job title and name of individual filling each job? *titles but no names* ☐ Yes ☒ No
- 2) Written description of each job? ☒ Yes ☐ No
- 3) Written description of type and amount of training to be given? ☒ Yes ☐ No
- 4) Documentation of training given? ☐ Yes ☒ No
- b. Is an annual review of training accomplished? ☐ Yes ☒ No
- c. Are the training records maintained at the facility? ☐ Yes ☒ No
- d. How long are records kept for:
- 1) Current employees? .....
- 2) Former employees? .....

---

### Section I - Preparedness and Prevention

§265.31

1. Is there evidence of fire, explosion or contamination of the environment? ☐ Yes ☒ No

If yes, use narrative explanation sheet to explain.

- 
2. Is the facility equipped with (as appropriate):

- a. Internal communication or alarm system? ☒ Yes ☐ No
- b. Telephone or two-way radio to call emergency response personnel? ☒ Yes ☐ No
- c. Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? ☒ Yes ☐ No
- d. Water of adequate volume and pressure for hoses, sprinklers or water spray systems? ☒ Yes ☐ No

Describe source of water municipal system

§265.33

3. Are all communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, tested and maintained to assure proper operation? ☒ Yes ☐ No

- §265.34 4. Are communications or alarm systems, where required, readily accessible? ☒ Yes ☐ No
- §265.35 5. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment in an emergency? ☐ Yes ☒ No
- §265.37 6. Has the owner/operator attempted to make the following arrangements with the local authorities as appropriate:
- a. To familiarize police, fire departments and emergency response teams with layout of facility, properties of hazardous waste handled and associated hazards, places where personnel would normally be working, entrances to roads inside facility and possible evacuation routes? ☒ Yes ☐ No
  - b. In the case where more than one police and fire department might respond, agreements designating primary emergency authority? ☒ Yes ☐ No
  - c. Agreements with State emergency response teams, emergency response contractors and equipment suppliers? ☒ Yes ☐ No
  - d. To familiarize local hospitals with the properties of hazardous wastes handled and types of injuries or illnesses that would result? ☒ Yes ☐ No
7. Where state or local authorities decline to enter into such arrangements, is this documented in the operating record? ☒ Yes ☐ No

---

Section J. Contingency Plan and Emergency Procedures

- §265.52 1. Does the facility have a contingency plan? ☒ Yes ☐ No
- a. Is it an amendment to a Spill Prevention Control and Countermeasures (SPCC) Plan? ☐ Yes ☒ No
  - b. Does the plan include:
    - 1) Arrangements with local authorities to coordinate emergency services? ☒ Yes ☐ No
    - 2) List of names, addresses and phone numbers of emergency coordinators? ☒ Yes ☐ No
    - 3) List of all emergency equipment at facility? ☒ Yes ☐ No
    - 4) Evacuation plan? ☒ Yes ☐ No

c. Is ☐ copy of the contingency plan and all revisions:

1) Maintained at the facility?

☒ Yes ☐ No

2) Submitted to all local authorities that may be called upon to provide services?

☒ Yes ☐ No

\$265.55

2. Is there an emergency coordinator on site or on call at all times?

☒ Yes ☐ No

3. Have there been any incidents requiring the implementation of the contingency plan?

☐ Yes ☒ No



DRAFT

Inspector: Tim Curry  
Address: 25 Funston Rd.

Telephone no: 236-3884

RCRA LAND RESTRICTION  
F- SOLVENT  
GENERATOR CHECKLIST

I. HANDLER IDENTIFICATION

Nordex/Cat  
A. Handler Name B. Street (or other identifier)  
Postville. Iowa. 52162 Chickasaw  
C. City D. State E. Zip Code F. County Name

Laminates  
G. Nature of business; Identification of Operations

IAD 073489288  
H. EPA ID #

Mark Zweibohmer  
I. Handler Contact (Name and Phone Number)

II. Generator Compliance

A. F-Solvent Identification

Comments

1. Does the handler generate the following wastes?

a. F001 ☐ Yes ☒ No

b. F002 ☐ Yes ☒ No

c. F003 ☐ Yes ☐ No

If an F003 wastestream listed solely for ignitability was mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic?

☐ Yes ☒ No

d. F004 ☒ Yes ☒ No

e. F005 ☒ Yes ☐ No

F003 waste contains constituent listed in F003

2. Source of the above: Form 8700-12 ☐; Part A ☐; Part B ☐; Other (specify) ☒

Appendix A is intended to assist the inspector and enforcement official in determining whether the handler is generating F-solvent wastes, if such wastes were not identified by the handler previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A. Note concerns below:

UNAFI

Handler Name: Nordlex/Cbk

ID Number: IAD 673464268

Inspector: TJC

Date: 6/7/93

B. National Variances and Extensions/Petitions

Comments

1. Is the waste generated by a Small Quantity Generator? [268.30(a)(1)] Yes ☒ No
2. Is the waste generated from a RCRA corrective action? [268.30(a)(2)] Yes ☒ No Some
3. Is the waste generated from a CERCLA response action? [268.30(a)(2)] Yes ☒ No Some
4. Is the solvent waste a solvent-water mixture, solvent-containing sludge, or solvent-contaminated soil containing less than one percent total FO01-FO05 constituents by weight? [268.30(a)(3)] Yes ☒ No Some
5. Any extensions/petitions approved? Yes ☒ No

C. BDAT Treatability Group - Treatment Standards Identification

1. Did the generator correctly determine the appropriate treatability group and treatment standards of the waste [§268.41]. Wastewaters containing solvents; spent methylene chloride in pharmaceutical wastewaters; all other spent solvent wastes? Yes No

D. Waste analysis

1. Did the generator determine whether the waste exceeds treatment standards based on §268.7(a):

a. knowledge of the waste ☒ Yes No

b. TCLP Yes ☒ No

If knowledge, note how this is adequate: Concentrations of chemicals prior to use

If determined by TCLP, provide date of last test, frequency of testing, and attach test results.

Dates/frequency: \_\_\_\_\_

Note any problems: \_\_\_\_\_

- c. Were wastes tested using TCLP when a process or wastestream changes? Yes ☒ No

Comments

2. Did the F-solvent wastes exceed applicable treatability group treatment standards upon generation [§268.7(a)(2)]? ☒ Yes ☐ No ☐ Some ..
3. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [§268.3] ☐ Yes ☒ No

E. Management

1. On-site management

- a. Were F-solvent wastes managed on-site? ☒ Yes ☐ No

If yes, answer 1(b) and (c); if no, answer 2.

- b. For wastes that exceed treatment standards, was treatment, storage and/or disposal conducted? ☐ Yes ☒ No

If yes, TSDF Land Restriction checklist must be completed.

- c. Are test results maintained in the operating record? ☒ Yes ☐ No

2. Off-site management

- a. If F-solvent wastes exceed treatment standards, did generator provide treatment facility [268.7(a)(1)]:

(i) EPA waste number? ☐ Yes ☒ No

(ii) Applicable treatment standard? ☐ Yes ☒ No

(iii) Manifest number? ☐ Yes ☒ No

(iv) Waste analysis data, if available? ☐ Yes ☒ No

Identify off-site treatment facilities

---

---

Handler Name: Norplex/Cak  
ID Number: \_\_\_\_\_  
Inspector: TJC  
Date: 6/7/88

Comments

b. If F-solvent wastes does not exceed treatment standards, did generator provide the disposal facility [268.7(a)(2)]:

(i) EPA Hazardous waste number? N/A Yes ☐ No ☐

(ii) Applicable treatment standard? Yes ☐ No ☐

(iii) Manifest number? Yes ☐ No ☐

(iv) Waste analysis data, if available? Yes ☐ No ☐

(v) Certification regarding waste and that it meets treatment standards? Yes ☐ No ☐

Identify land disposal facilities receiving the BDAT certified wastes. \_\_\_\_\_

c. If waste is subject to nation-wide variance (e.g., solvent-water mixtures less than 1%), extension (268.5) or petition (268.6) does generator provide notice to disposer that waste is exempt from land disposal restrictions [268.7(a)(3)]?

N/A Yes ☐ No ☐

F. Storage of F-solvent waste

1. Was F-solvent waste stored for greater than 90 days (after variance 180/270 days for SQG)? Yes ☐ No ☒

If yes, was facility operating under interim status or permit? Yes ☐ No ☐

If yes, TSDF Checklist must be completed.

DRAFT

Handler name Korplex/Oak

ID Number

Inspector TJE

Date 6/7/98

G. Treatment Using RCRA 264/265 Exempt Units or Processes

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes?

Yes ☒ No

If yes, list type of treatment unit and processes \_\_\_\_\_

Residuals from RCRA-exempt treatment units are subject to Land Disposal Restrictions Program. Ascertain whether residuals have been subjected to restriction program requirements.

Handl Name: \_\_\_\_\_  
 ID Number: \_\_\_\_\_  
 Inspector: \_\_\_\_\_  
 Date: \_\_\_\_\_

APPENDIX A

SOLVENT IDENTIFICATION CHECKLIST

Comments

1. Does the handler generate any of the following F001 constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	_____ Yes	_____ No
trichloroethylene	_____ Yes	_____ No
methylene chloride	_____ Yes	_____ No
1,1,1-trichloroethane	_____ Yes	_____ No
carbon tetrachloride	_____ Yes	_____ No
chlorinated fluorocarbons	_____ Yes	_____ No

2. Does the handler generate any of the following F002 constituents (i.e., spent halogenated solvents) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	_____ Yes	_____ No
trichloroethylene	_____ Yes	_____ No
methylene chloride	_____ Yes	_____ No
1,1,1-trichloroethane	_____ Yes	_____ No
chlorobenzene	_____ Yes	_____ No
trichlorofluoromethane	_____ Yes	_____ No
1,1,2 trichloro 1,2,2-trifluoroethane	_____ Yes	_____ No
ortho-dichlorobenzene	_____ Yes	_____ No
1,1,2-trichloroethane	_____ Yes	_____ No

3. Does the handler generate any of the following F003 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

xylene	_____ Yes	✓ No
acetone	✓ Yes	_____ No
ethyl acetate	_____ Yes	✓ No
ethyl benzene	_____ Yes	✓ No
ethyl ether	_____ Yes	✓ No
methyl isobutyl ketone	_____ Yes	✓ No
n-butyl alcohol	_____ Yes	✓ No
cyclohexane	_____ Yes	✓ No
methanol	✓ Yes	✓ No

used in a mixture listed as F005

# REPORT

Handler Name: Norplex/Cak  
 ID Number: \_\_\_\_\_  
 Inspector: TJC  
 Date: 6/7/83

Comments

If the F003 wastestream has been mixed with a solid waste, does the resultant mixture exhibit the ignitability characteristic?

☒ Yes ☐ No

4. Does the handler generate any of the following F004 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

cresols and cresylic acid  
nitrobenzene

☐ Yes ☒ No  
☐ Yes ☒ No

5. Does the handler generate any of the following F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

toluene  
 methyl ethyl ketone  
 carbon disulfide  
 isobutanol  
 pyridine  
 benzene  
 2-ethoxyethanol  
 2-nitropropane

☒ Yes ☐ No  
☐ Yes ☒ No  
☐ Yes ☒ No  
☐ Yes ☒ No  
☐ Yes ☒ No  
☐ Yes ☒ No  
☐ Yes ☒ No  
☐ Yes ☒ No

6. Are any of the constituents listed in the questions 1-5 used for their "solvent" properties — that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.

☒ Yes ☐ No

(a) Chemical carriers?

☐ Yes ☒ No

If the answer is yes, list the constituents.

(b) Degreasing/cleaning?

☒ Yes ☐ No

If the answer is yes, list the constituents.

4-14

DRAFT

Handler Name:

Vortex/Cat

ID Number:

Inspector:

Date:

(c) Diluents?

Yes ☒ No

Comments

If the answer is yes, list the constituents.

(d) Extractants?

Yes ☒ No

If the answer is yes, list the constituents.

(e) Fabric scouring?

Yes ☒ No

If the answer is yes, list the constituents.

(f) Reaction and synthesis media?

Yes ☒ No

If the answer is yes, list the constituents.

If questions 1-6 led the inspector to believe the waste may be an F-solvent answer question 7.

7. Are any of the above constituents spent solvents? A solvent is considered "spent" when it has been used and is no longer used without being regenerated, reclaimed, or otherwise reprocessed.

Yes ☒ No



E-100-T

Handler Name: Worplex/Oak  
ID Num: \_\_\_\_\_  
Inspector: \_\_\_\_\_  
Date: \_\_\_\_\_

8. If the waste is a mixture of constituents as determined in questions 1-6, answer this to determine whether it is a "solvent mixture" covered by the listings.

If the wastestream is mixed and contains more than one of the F001-F005 constituents listed in questions 1-5 (by volume), give the concentration before use of all the constituents in the solvent mixture/blend. For example:

Comments

5% methylene chloride  
2% trichloroethylene  
25% 1,1,1-trichloroethane  
68% mineral spirits  
100%

If the wastestream is a mixture containing a total of 10% or more (by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed waste.

With respect to the F003 solvent wastes, if, before use, the wastestream is mixed and contains only F003 constituents, it is a listed waste. For example:

33% acetone  
16% methanol  
51% ethyl ether  
100%

If the wastestream is a mixture containing F003 constituents and a total of 10% or more of one or more of the F001, F002, F004, and F005 listed constituents before use, it is a listed waste.  
For example:

50% xylene F003  
12% TCE F001  
38% mineral spirits  
100%

If in light of the above, the handler appears to be generating F001-F005 hazardous wastes, refer this facility to the enforcement official for follow-up actions verifying the use of solvents at the facility.

Stock # V-80



Delta County Public Health  
1-800-484-4602



6/7/88

Norplex / Oak  
Postville, Iowa

Photo 1: Hazardous waste  
storage area.

JUN 1988 D

Kodak

PROCESSED BY

TJC

6/7/88

Norplex / Oak  
Postville, Iowa

Photo 2: Drums containing waste  
in the storage area.

JUN 1988 D

Kodak

PROCESSED BY

Kodak

PROCESSED BY

Note the two open top  
drums in back. Mr.  
Zweibohmer was not sure of  
the contents due to the  
lack of labels or dates of  
accumulation.

TJC

6/7/88

Norplex / Oak  
Postville, Iowa

Photo 3: Three drums that were  
noted as in poor condition  
due to the expansion of  
the material in the heat.

JUN 1988 D

Kodak

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JUN 1988 D

Kodak

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JUN 1988 D

Kodak

PROCESSED BY

TJC